

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND DIVISION**

IN RE:

CASE NO. 21-10483

DJM Holdings, Ltd.

CHAPTER 11

JUDGE ARTHUR I HARRIS

Debtor

NOTICE OF ELECTION UNDER 11 USC § 1111(b)(2)

NOW COMES Earnest Inc. ("Creditor"), by and through its counsel, and respectfully elects pursuant to FRBP 3014 to pursue its remedies under §1111 (b)(2) of Title 11 U.S.C.

Creditor is the holder of a mortgage on real estate located at 5154 Anthony Street Maple Heights, OH 44137. Debtor's Plan attempts to wrongfully cram down Creditor's claim to the amount of \$26,802.10. Creditor holds a secured claim in the amount of \$93,865.41. Creditor specifically elects pursuant to 1111 (b) of Chapter 11, Title 11 U.S.C. application of Paragraph (2) of §1111 (b).

DATE: June 29, 2021

/s/ Jon J. Lieberman
Jon J. Lieberman (0058394)
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CERTIFICATE OF SERVICE

I certify that on March 19, 2021, a true and correct copy of the foregoing Notice was served:

Via the Court's ECF system on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Glenn E. Forbes, Debtor's Attorney
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United States Trustee
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Maria D. Giannirakis ust06, Attorney for U.S. Trustee
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And by regular US Mail, postage pre-paid on:

Martin A Maniaci
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DJM Holdings, Ltd.
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Concord, OH 44077

Nia and LaShawn Gordon
5154 Anthony,
Maple Heights, OH 44137

/s/ Jon J. Lieberman
Jon J. Lieberman (0058394)